

Exhibit 3

From: Carter, Sean [mailto:SCarter1@cozen.com]
Sent: Thursday, June 27, 2013 1:12 PM
To: Aisha Henry
Cc: Eric L. Lewis; Mark J. Leimkuhler; 'Haefele, Robert'; Tarbutton, J. Scott; WTC[jkreindler@kreindler.com]; WTC[jgoldman@andersonkill.com]
Subject: RE: 9/11 MDL - IIRO/MWL

Aisha –

We'll get back to you early next week with some dates that work for folks on our side. We should note up front that, while we are perfectly happy to provide some illustrative examples of continuing gaps in your clients' productions to assist you in evaluating the dimension of the problem, any "list" we provide in the context of these discussions would not displace the obligations of your clients to conduct comprehensive searches of their records for responsive materials. As we trust you are aware, the Court already has admonished the MWL and IIRO that there has to be a comprehensive approach to the discovery process, and it is not sufficient for those defendants to simply track down specific missing documents identified by the plaintiffs.

Regards, Sean

From: Aisha Henry [\[mailto:Aisha.Henry@lewisbaach.com\]](mailto:Aisha.Henry@lewisbaach.com)
Sent: Monday, June 24, 2013 3:25 PM
To: Carter, Sean
Cc: Eric L. Lewis; Mark J. Leimkuhler
Subject: RE: 9/11 MDL - IIRO/MWL

Sean,

As per your emails with Eric, we would like to discuss with you the remaining deficiencies perceived in our clients' current productions. As previously indicated, we have some views about where we think our clients could improve their record but we also understand that in the past our clients have produced documents that you did not want and, therefore, it would seem to make sense that we discuss the particulars so that we are all on the same page. Accordingly, we once again request a call so that we can come to an agreement on the protocol going forward. Please let us know when you are available.

Regards,
Aisha

From: Carter, Sean [\[mailto:SCarter1@cozen.com\]](mailto:SCarter1@cozen.com)
Sent: Tuesday, May 14, 2013 10:39 AM

To: Eric L. Lewis
Cc: Mark J. Leimkuhler; Aisha Henry
Subject: RE: 9/11 MDL - IIRO/MWL

Eric – Thanks. Folks on my side are generally agreeable to the timeline outlined in your email proposal, so perhaps we can try to get agreement from all to that issue and then move on to discussions of some particulars.

From: Eric L. Lewis [<mailto:Eric.Lewis@lewisbaach.com>]
Sent: Tuesday, May 14, 2013 10:36 AM
To: Carter, Sean
Cc: Mark J. Leimkuhler; Aisha Henry
Subject: RE: 9/11 MDL - IIRO/MWL

Dear Sean

We obviously wanted to address issues with our clients and there will no doubt be a discovery period with respect to the individual defendants coming back into the case once the mandate issues. Having said that, we are happy to run it by defendants. Let us know when it might be convenient to meet or chat and we will be sure to get some feedback in advance of that.

Best

Eric

From: Carter, Sean [<mailto:SCarter1@cozen.com>]
Sent: Tuesday, May 14, 2013 9:41 AM
To: Eric L. Lewis
Cc: Mark J. Leimkuhler; Aisha Henry
Subject: RE: 9/11 MDL - IIRO/MWL

Eric – Have you run this proposal by counsel for any of the other defendants to determine if they are generally agreeable? Several counsel on my side are a bit concerned about reaching agreement with you only to be dragged into a subsequent negotiation with other of the defendants. Let me know and thanks, Sean

From: Eric L. Lewis [<mailto:Eric.Lewis@lewisbaach.com>]
Sent: Wednesday, May 01, 2013 3:02 PM
To: Carter, Sean
Cc: Mark J. Leimkuhler; Aisha Henry
Subject: 9/11 MDL - IIRO/MWL

Dear Sean,

We wanted to follow-up with you regarding our conversation at the April 16 status conference. You mentioned that your team had informally agreed in principle to an additional period of discovery for IIRO and MWL, geared towards addressing any remaining deficiencies perceived in their current productions. I suggested a 6-month supplemental discovery period and you said that would likely work but again subject to discussion with your colleagues. Of course, the 2d Circuit decisions came

down the same day and we all needed to consider the impact on discovery, given that there was likely to be a period for jurisdictional discovery for the numerous individual defendants brought back in the case.

We also discussed that we would need to reach an agreement as to what this follow-up discovery would entail and we'd like to hear from you as soon as possible as to what you think our clients ought to be looking for so that we are all on the same page and there are no surprises at the conclusion of the period. As I said, we have a sense of where we think our clients could improve their record but obviously you may have different views and it would seem to make sense that we have the same expectations in order to bring this phase to a satisfactory closure and get on with the merits. There is also the additional consideration of the jurisdictional discovery with respect to the remanded individuals formerly and presently associated with MWL and we can discuss that issue with you as well, in conjunction with Alan Kabat and Lynne Bernabei. Our expectation would be that we would work out an agreement with you over the next 3 weeks or so, loop in our respective co-parties as necessary, include the issue as an item in the pre-conference agenda letter, and be prepared to move the Court on May 30 to adopt a supplemental production schedule.

I will be out of the country next week, but feel free to contact my partners Mark Leimkuhler or Aisha Henry in my absence. I am also reachable by email or cell phone, 202 352 8900.

We look forward to hearing from you.

Regards,
Eric

Eric L. Lewis

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